

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF E.C.

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ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, E.C., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I live in Seattle, Washington with my husband and three children.

5 3. I earned a Bachelor's degree from Brown University, a Master's degree from
6 New York University, and a Master's degree from Middlebury College. I moved to Seattle with
7 my husband in 2008. Since moving to Seattle, I worked as a teacher for many years and I now
8 work for a political non-profit. My husband is a medical doctor.

9 4. Our oldest child is transgender. I have chosen to use a pseudonym and to refer to
10 her in this declaration as "Child A" because I am fearful for her and our family's safety and
11 privacy in the current political climate. Child A is currently 14 years old and is in the 9th grade.
12 She is very creative, loves to make art, and her favorite activity is reading. If she could, she
13 would stay up all night engrossed in a book. When she was born, she was designated male on
14 her birth certificate, but her gender identity is female.

15 5. Before I knew that my daughter was transgender, I noticed that she experienced
16 depression and anxiety. She has dealt with anxiety from a young age.

17 6. I found out my daughter was transgender in December 2020, when she was 10
18 years old and confided to me that she wanted to be a girl. After that, my husband and I had many
19 long conversations with each other to try and understand the implications of what she had told
20 us. We also spoke with our daughter at length to confirm what she was experiencing and feeling.
21 Our daughter was firm in how she felt and told us she felt like how she presented on the outside
22 didn't match who she was on the inside.

23 7. Once we realized that our daughter might be transgender, I contacted Seattle
24 Children's Hospital almost immediately in order to get advice from medical professionals. I also
25 spoke to my primary care provider, who has a transgender child and provides gender-affirming
26 care themselves, for advice. We also spoke with our child's pediatrician. On the advice of her

1 doctor at Children's and her pediatrician, our daughter began seeing a therapist, both in
2 individual sessions and in family sessions.

3 8. My husband and I are supportive of our daughter's identity. As a parent, you
4 support your child—that is your main job. At the same time, we were scared for her. I had heard
5 about how difficult it is to be transgender, and I did not want my daughter to have a difficult life.
6 I was very concerned for what this might mean for the rest of her life. I was scared that she would
7 be targeted at school or by society.

8 9. In the spring of 2021, after continuing conversations with Child A and her
9 medical providers, we agreed with our daughter that she should socially transition. Our
10 understanding is that transitioning looks different for everyone, but for her, this meant using
11 female pronouns and changing her outward appearance, such as her hairstyle. During that year,
12 she came out as transgender to the rest of our family, as well as to her classmates and teachers.
13 In the fall of 2021, she began wearing girl's clothes.

14 10. I noticed that after she began socially transitioning, she became much happier and
15 content with her body. She said she felt her outside finally matched her inside. I recall that one
16 day, when I took our daughter shopping and bought her a girl's romper, she kept describing a
17 feeling of gender euphoria because she was appearing the way she wanted to appear. After she
18 started wearing girl's clothes, she did not get misgendered. She told me she began feeling more
19 like herself.

20 11. In the spring of 2021, after extensive consultation with her doctor, therapist, and
21 our own research, Child A began taking puberty blockers. We believed this was the best option
22 to give her extra time to figure out her gender identity and see how she feels as she gets older.
23 We were very concerned about our daughter's health and got many opinions from medical
24 providers about our fears around fertility and bone density. We agreed on puberty blockers
25 because they are reversible and can be stopped at any time. Deciding to start puberty blockers
26 was a stressful process, but we are confident we made the right decision for our daughter.

1 12. In 2023, Child A began taking estrogen with the support of her doctor, and also
2 switched from a puberty blocker injection to a less burdensome puberty blocker implant. She
3 was initially using estrogen patches, but she began to have fluctuations in her hormone levels
4 and corresponding mood swings, so she switched to estrogen injections. Since starting estrogen
5 injections, her hormone levels and mood have been more stable.

6 13. Though transitioning has been difficult, our daughter has never expressed regret
7 or doubts about her transition. As her parents, we were terrified by this process at first and spoke
8 with her many times about how many different ways there are to be a boy. We were very
9 concerned because we know it can make life more difficult to be transgender, because of the
10 persecution of trans people in our society. Despite these potential obstacles, our daughter has
11 never wavered. Since transitioning, she has always been clear about who she is.

12 14. In late January 2025, I became aware of an Executive Order putting conditions
13 on gender-affirming care for youth. Our daughter found out before I did because someone at her
14 school told her about it. The language used in the Executive Order made our daughter, my
15 husband, and me very distressed. While she was calm about it, she described feeling depressed,
16 anxious, and hopeless, especially for other transgender children who do not have the support of
17 parents like hers or do not live in Washington State.

18 15. I do not consider it an option for our daughter to stop the current medical
19 treatment she is receiving in order to transition. When her hormone levels have fallen in the past,
20 her mental health dropped precipitously, and her problems with anxiety, depression, and suicidal
21 ideation became worse. I believe the same thing would happen if she were unable to continue
22 her current course of medical treatment, or if it were interrupted even temporarily. I am not
23 willing to risk my daughter feeling suicidal and any adverse physical effects that a sudden stop
24 of hormone treatment might cause.

25 16. If I were no longer able to access this care from our current provider, I would try
26 to find it anywhere we could. This would most likely involve significant costs in travel, research,

1 and medical bills that we would not incur otherwise as our daughter's treatment is currently
 2 covered by our insurance plan. If we had to obtain it elsewhere, or our insurance no longer
 3 covered it, it would be very difficult and expensive for our family.

4 17. If I could not find this care for my daughter in the United States, we would mostly
 5 likely move her to another country in order for her to be able to continue to receive medical
 6 treatment. Washington is our home. Both my husband and I live and work here, and our three
 7 children have lived here for their entire lives. As we have two other children in Washington,
 8 searching for care in another country would most likely mean splitting up our family, with my
 9 husband or me moving with Child A without her siblings and one of her parents. We do not
 10 otherwise want to leave the United States.

11 I declare under penalty of perjury under the laws of the State of Washington and the
 12 United States of America that the foregoing is true and correct.

13 DATED this 4 day of February 2025 at Seattle, Washington.

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 16 E.C.
 17 Parent of Child A
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